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RECEIVED
FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

2012 JUL 24 PM 3:19

COMPLAINT

OFFICE OF ETHICAL
COUNSEL

RESPONDENTS

MARGARET ROTHSCHILD

PROGRESS FOR WASHINGTON

FRIENDS OF LAURA RUDERMAN

MUR No. 6611

INTRODUCTION

Through this complaint, James R. Baum ("Complainant"), of Maple Valley, Washington, 98038, alleges that Margaret Rothschild, Progress for Washington and Friends of Laura Ruderman have committed violations of the contribution provisions of the Federal Election Campaign Act ("FECA" or the "Act"), as described below. In summary, Complainant believes that Progress for Washington and Ms. Rothschild are actively making public communications that are coordinated with Ms. Ruderman's authorized campaign committee, and are therefore in violation of the contribution limitations on Progress for Washington's political activity as an Independent Expenditure-only Committee.

FACTS

The following statements are based on my belief and information. On June 18, 2012, Progress for Washington (FEC Committee ID No. C00523571) filed a Statement of Organization with the Federal Election Commission ("FEC" or "Commission") to establish itself as a federal Independent Expenditure-Only Committee, or "Super PAC." This type of political committee may accept contributions of unlimited amounts from permissible sources, but must limit its political activity to making only independent expenditures in support of or opposition to a federal candidate. According to Progress for Washington's only FEC filing to date disclosing anything about its funding sources, the committee has benefited from only one exceptionally generous donor. Margaret Rothschild contributed \$115,000 on June 25, 2012. Ms. Rothschild is the mother of Laura Ruderman, candidate for the United States House of Representatives from Washington's first congressional district.

As of the date of this complaint, Progress for Washington has reported independent expenditures for television advertising, printing and postage totaling \$213,283.80, entirely against Suzan DelBene, also a candidate for the United States House of Representatives from Washington's first congressional district. A close examination of the facts and circumstances of these "independent" expenditures show that they are anything but independent, and are in fact closely coordinated with Ms. Ruderman's congressional campaign.

Friends of Laura Ruderman is Ms. Ruderman's authorized campaign committee for her congressional campaign. Ms. Rothschild, Progress for Washington's sole donor and Ms. Ruderman's mother, is not only active in her daughter's campaign but also plays a starring role

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in a television advertisement paid for and produced by Friends of Laura Ruderman.¹ The ad is a “positive” advertisement for Ms. Ruderman, focusing on her family’s struggles with health and her support of President Obama’s healthcare law.

Given Ms. Rothschild’s starring role in this campaign-funded advertisement, it is clear that Ms. Rothschild is actively involved in her daughter’s campaign and knew of the campaign advertisement long before it became public information by airing throughout Washington’s first congressional district. Professional, slick campaign advertisements like Ms. Ruderman’s are not typically produced overnight – scripts, filming, and editing can take weeks even in the most efficient campaign. It is likely that Ms. Rothschild was involved in this ad, featuring her as an integral part, from its very early stages. While acting in her role in front of the camera for her daughter’s campaign, Ms. Rothschild donned her “independent” hat to bankroll a series of negative advertising using her shell committee, Progress for Washington.² Ms. Rothschild, through Progress for Washington, first funded ads against Ms. DelBene through mailers and then television advertisements.³

Progress for Washington has carefully timed its advertising to correspond with the media rollout of Ms. Ruderman’s campaign. On July 17, 2012, Progress for Washington began its media buy featuring its attack ad against Ms. DelBene. Only one day earlier, Ms. Ruderman’s

¹ “SNEAK PEEK: Watch our new TV ad,” <http://www.lauraruderman.org/2012/07/16/sneak-peak-watch-our-new-TV-ad/>.

² See, e.g., Johnathan Martin, *Anti-Suzan DelBene PAC funded by mother of opponent Laura Ruderman*, Politics Northwest Blog at The Seattle Times, Jul. 16, 2012, <http://blogs.seattletimes.com/politicsnorthwest/2012/07/15/anti-suzan-delbene-pac-funded-by-mother-of-opponent-laura-ruderman/>.

³ See Attachment A (Progress for Washington FEC Filings). Of late, Progress for Washington has also targeted Darcy Banner who is also a candidate for the United States House of Representatives from Washington’s first congressional district.

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campaign launched its own ad featuring the candidate's mother.⁴ In fact, Progress for Washington's entire offensive on Ms. Ruderman's behalf started just two weeks prior to that television advertisement. While Progress for Washington had only sent a single mailer by July 6, blogger David Goldstein of *The Stranger* reported hearing from "a couple sources that Ruderman had been hinting to people that something big was coming."⁵ The dates themselves are evidence of coordination, but Mr. Goldstein's blog entry clearly suggests that the campaign – or the candidate herself – had full knowledge of Progress for Washington and Ms. Rothschild's plans.

Ms. Rothschild and Progress for Washington seemed to carefully select topics and targets that Friends of Laura Ruderman was avoiding. Namely, while Ms. Ruderman's cash-strapped campaign aired a so-called "positive" advertisement, Ms. Rothschild and Progress for Washington worked as the campaign's attack dog against Ms. DelBene.⁶ Generally, such an informal division of labor is not in violation of federal campaign finance law. However, in this case, the exclusive funder of these advertisements is so personally tied to not only the candidate but also the candidate's campaign strategy as to be firing Ms. Ruderman's official campaign advertisements. Based on the correlation of Ms. Rothschild's public involvement in the campaign, and the timing of those advertisements, Ms. Rothschild obviously possessed material

⁴ See, e.g., Joel Connelly, *Ruderman and mom: High road and low road*, Strange Bedfellows Blog at Seattle Post-Intelligencer, Jul. 16, 2012, <http://blog.seattlepi.com/seattlepolitics/2012/07/16/ruderman-and-mom-high-road-and-low-road/> (noting that "events of the past 24 hours suggest there are blood ties, as well as close consultant and contributor links" between the Ruderman campaign and Progress for Washington).

⁵ David Goldstein, *First CD Race Turns Negative*, Slog Blog at *The Stranger*, Jul. 6, 2012, <http://slog.thestranger.com/slog/archives/2012/07/06/first-cd-race-turns-negative/>.

⁶ See, Charlie Mahtesian, *Mom's shadowy super PAC*, Politico, Jul. 16, 2012, <http://www.politico.com/story/charlie-mahtesian/2012/07/moms-shadowy-super-pac-129082.html>; Johnathan Martin, *Ruderman's mother funds group's ads attacking DelBene*, Seattle Times, Jul. 15, 2012, http://seattletimes.nwsource.com/html/localnews/2018697037_1stdistrict16m.html.

information regarding the campaign's plans and strategy and used that information in determining the direction and content of her attack ads.

LAW

FECA and Commission regulations define the terms "contribution" and "expenditure" to include any gift of money or "anything of value" for the purpose of influencing a Federal election. 2 U.S.C. 431(8)(A) and (9)(A); 11 CFR 100.52(a) and 100.111(a); see also 2 U.S.C. 441b(b)(2). The Act defines an in-kind contribution to include an expenditure "made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents." 2 U.S.C. 441a(a)(7)(B)(i). The Act and Commission regulations prohibit any person from making any contribution or expenditure, including providing "anything of value," in connection with a Federal election in excess of permissible limits, currently set at \$2,500 per election per candidate, and \$5,000 per calendar year for a non-connected political committee. 2 U.S.C. 441a(a)(1)(A); 11 CFR 110.1(b). It is a violation of the Act and Commission regulations for a federal candidate or her political committee to knowingly accept a contribution in violation of Commission regulations. 2 U.S.C. § 437g(d); 11 C.F.R. 110.9.

A political committee may make unlimited independent expenditures from its own funds, and individuals may pool unlimited funds in an independent expenditure-only political committee. *Speechnow.org v. FEC*, 599 F.3d 686, 689 (D.C. Cir. 2010 (*en banc*)). A committee that only makes independent expenditures may solicit and accept unlimited contributions from individuals, political committees, corporations, and labor organizations. AO 2010-11 (Commonsense Ten). Otherwise, a committee is subject to federal contribution limits of \$5,000

in donations per calendar year from a permissible donor and disbursements of \$2,500 per election per federal candidate.

A coordinated communication is treated as an in-kind contribution to the candidate, authorized committee, or political party committee with whom it is coordinated and must be reported as an expenditure made by that candidate, authorized committee, or political party committee 2 U.S.C. §§ 441a(a)(7)(B)(i); 11 CFR § 109.21(b)(1). A communication is coordinated with a candidate, an authorized committee, a political party committee, or an agent of any of the foregoing when the communication meets all three of the following "prongs" of a coordinated communication:

- (1) is paid for, in whole or part, by a person other than that candidate, authorized committee, political party committee, or agent;
- (2) satisfies at least one of the content standards described in 11 C.F.R. § 109.21(c); and
- (3) satisfies at least one of the conduct standards described in 11 C.F.R. § 109.21(d).

11 C.F.R. § 109.21(a).

The content prong is satisfied if the communication is: (1) an electioneering communication under 11 CFR 100.29; (2) a public communication that disseminates, distributes, or republishes campaign materials prepared by a candidate at any time; (3) a public communication that expressly advocates the election or defeat of a clearly identified candidate at any time; (4) a public communication that refers to a clearly identified federal candidate, is made within 120 days of an election, and is directed to voters in the jurisdiction of the clearly identified candidate; or (5) a public communication that is the functional equivalent of express advocacy. 11 C.F.R. § 109.21(c).

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The conduct prong of the coordinated communications standard is satisfied if at least one of the following elements exists, *even in the absence of agreement or formal collaboration*: (1) the communication is created, produced, or distributed at the request or suggestion of a candidate, authorized committee, political party committee or agent of the campaign committee or any of these entities or persons assent to a suggestion made by the person making the communication that such a communication be made; (2) the communication is made with the material involvement of the candidate, authorized committee or political party committee (or an agent thereof) in decisions regarding the communication as to the content, intended audience, means or mode of communication, specific media outlet to be used, timing or frequency of the communication or size, prominence or duration of the communication (with respect to broadcast, cable or satellite); (3) the communication is created, produced, or distributed after at least one substantial discussion between the payor (or her agent) and the candidate (or her agent). A discussion is substantial if information about the candidate's plans, projects, activities or needs are conveyed and that information is material to the creation, production or distribution of the communication; (4) the person paying for the communication and the campaign shares a common vendor, as defined by Commission regulations, and that vendor uses or conveys information about the candidate's plans, projects activities or needs, or uses information in its possession that was obtained through their relationship with the candidate and that information is material to the creation, production or dissemination of the communication; (5) the person paying for the communication employs a former employee, as defined by Commission regulations, that conveys information about the candidate's plans, projects activities or needs, or uses information in its possession that was obtained through their employment with the candidate and that information is material to the creation, production or dissemination of the

communication; or (6) a republished communication is distributed and one of the conduct standards described in sections (1) through (3) above are met. 11 C.F.R. § 109.21(d).

ANALYSIS

Ms. Rothschild, Progress for Washington, and Friends of Laura Ruderman are each in violation of contribution limitations of the FECA. Progress for Washington is actively engaged in an attack ad campaign denigrating Ms. DelBene. As described above, this campaign is entirely funded by Ms. Ruderman's mother, who has thus far made a single disclosed donation of \$115,600 to Progress for Washington. Since payment for these communications is from a non-campaign source, this satisfies the "payment" prong of the coordinated communications test. As further described above, this campaign is conducted through television advertisements and mailers which contain express advocacy, and therefore meet the definitions of either electioneering communications or public communications in satisfaction of the "content" prong of the coordinated communications test.

The content and timing of Progress for Washington's advertisements must be more than fortunate coincidence. Given the active involvement of Ms. Ruderman's mother in her official campaign advertisement obviously produced and filmed well in advance of when that communication was made public, Ms. Rothschild surely received material information during the production of that campaign advertisement. It follows that Ms. Rothschild, as an agent of Progress for Washington, engaged in coordination with her daughter or an agent of the campaign regarding material information used in producing Progress for Washington's communications, or informed her daughter of her plans to fund a Super PAC in support of her campaign, to which Ms. Ruderman assented. No relationship is closer than that between a mother and her daughter.

Ms. Ruderman lovingly explains the closeness of her bond with her mother in an advertisement that transforms their connection into a campaign issue. It is therefore unfathomable that a mother and daughter that share a spiritual attachment so publicly promoted by the Ruderman campaign would somehow have withheld comparatively trivial, yet material information about the campaign's strategies or plans.

It also seems obvious that the candidate or her agent was at least aware of Progress for Washington's planned communications by informing the media on July 6 that "something big is coming."⁷ Since all three of the coordinated communications tests are satisfied, Progress for Washington engaged in coordinated communications with Ms. Ruderman's campaign. These coordinated communications are in-kind contributions to that campaign.

Despite its explicit statement that it would make only independent expenditures, and would not make direct or in-kind contributions to any candidate, Progress for Washington is actively engaging in making in-kind contributions that are in violation of its Super PAC designation. Moreover, these in-kind contributions to Ms. Ruderman's authorized campaign committee far exceed permissible contribution limits for a traditional non-connected political committee. Additionally, because of these blatant campaign finance violations, Ms. Rothschild is engaged in making political contributions that significantly exceed permissible limits to neither the Ruderman campaign or a traditional non-connected political committee. Friends of Laura Ruderman violates FECA contribution limits by accepting these in-kind contributions over permissible contribution limits.

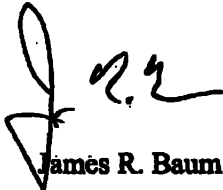
⁷ *Supra* n. 5

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PRAYER FOR RELIEF

Based on the knowing and willful violations of federal campaign finance law detailed above, I respectfully request the Commission to swiftly and appropriately act to deter further violations of the law by Ms. Rothschild, Progress for Washington and Friends of Laura Ruderman. Accordingly, I ask that the Commission enjoin each of these Respondents from further violations, fine the Respondents the maximum amount permitted by law, that Friends of Laura Ruderman be required to repay Progress for Washington for its illegal in-kind contribution, and that Progress for Washington's status as a Super PAC be revoked.

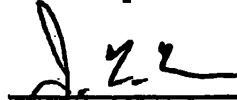
Respectfully submitted,



James R. Baum

I, James R. Baum, hereby verify that the statements made in the above complaint are, upon information and belief, true.

Sworn to pursuant to 18 U.S.C. §1001.


James R. Baum

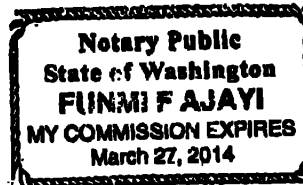
Washington

The foregoing instrument was subscribed and sworn before me this 21 day of July, 2012 by

James R Baum

Funmi F Ajayi
Notary Public

My commission expires: 3-27-2014



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ATTACHMENT A

Image# 12971438064

PAGE 1 / 8

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

PROGRESS FOR WASHINGTON

ADDRESS (number and street)

P.O. BOX 2624

Check if different than previously reported. (ACC)

KIRKLAND

WA

98033-2624

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00523571

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
- ☒ July 15 Quarterly Report (Q2)
- ☐ October 15 Quarterly Report (Q3)
- ☐ January 31 Year-End Report (YE)
- ☐ July 31 Mid-Year Report (Non-election Year Only) (MY)
- ☐ Termination Report (TER)

(b) Monthly Report Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11) (Non-Election Year Only)
- ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12) (Non-Election Year Only)
- ☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
- ☐ Convention (12C) ☐ Special (12S)

Election on

In the State of

(d) 30-Day POST-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

In the State of

5. Covering Period

04 / 01 / 2012

through

06 / 30 / 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer JEREMY PEMBLE

Signature of Treasurer

JEREMY PEMBLE

[Electronically Filed]

Date

07 / 15 / 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only							
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FEC FORM 3X
Rev. 12/2004

FEC00028

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SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

PROGRESS FOR WASHINGTON

Report Covering the Period:

From:

04

01

2012

To:

06

30

2012

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2012	0.00	0.00
(b) Cash on Hand at Beginning of Reporting Period.....	0.00	
(c) Total Receipts (from Line 19)	115000.00	115000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	115000.00	115000.00
7. Total Disbursements (from Line 31)	89434.20	89434.20
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	25565.80	25565.80
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

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DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

PROGRESS FOR WASHINGTON

Report Covering the Period:

From:

04 / 01 / 2012

To:

06 / 30 / 2012

I. Receipts
COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date
11. Contributions (other than loans) From:

- (a) Individuals/Persons Other Than Political Committees
(i) Itemized (use Schedule A).....

- (ii) Unitemized.....
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶

- (b) Political Party Committees.....
(c) Other Political Committees (such as PACs).....

- (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶

12. Transfers From Affiliated/Other Party Committees.....**13. All Loans Received.....****14. Loan Repayments Received.....**
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....
17. Other Federal Receipts (Dividends, Interest, etc.).....
18. Transfers from Non-Federal and Levin Funds

- (a) Non-Federal Account (from Schedule H5).....

- (b) Levin Funds (from Schedule H5).....

- (c) Total Transfers (add 18(a) and 18(b))..

19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶

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DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	13890.00	13890.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	13890.00	13890.00
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24. Independent Expenditures (use Schedule E)	75544.20	75544.20
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F)	0.00	0.00
26. Loan Repayments Made	0.00	0.00
27. Loans Made	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0.00	0.00
29. Other Disbursements	0.00	0.00
30. Federal Election Activity (2 U.S.C. §431(2))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	89434.20	89434.20
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	89434.20	89434.20

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	115000.00	115000.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	115000.00	115000.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	13890.00	13890.00
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	13890.00	13890.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 8 OF 8

(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

PROGRESS FOR WASHINGTON

Full Name (Last, First, Middle Initial)

A. Margaret Rothschild

Mailing Address 27750 94th Avenue SW

City
VashonState
WAZip Code
98070FEC ID number of contributing
federal political committee.

C

Name of Employer

Retired

Occupation

Retired

Receipt For:

☐ Primary
☐ Other (specify) ▼

☐ General

Aggregate Year-to-Date ▼

115000.00

Date of Receipt

06 / 25 / 2012

Transaction ID : SA11AI.4106

Amount of Each Receipt this Period

115000.00

Full Name (Last, First, Middle Initial)

B.

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary
☐ Other (specify) ▼

☐ General

Aggregate Year-to-Date ▼

Date of Receipt

Amount of Each Receipt this Period

Full Name (Last, First, Middle Initial)

C.

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary
☐ Other (specify) ▼

☐ General

Aggregate Year-to-Date ▼

Date of Receipt

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional).....▶

115000.00

TOTAL This Period (last page this line number only).....▶

115000.00

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SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE 7 OF 8

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28	<input type="checkbox"/> 29	<input type="checkbox"/> 30
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 28d	<input type="checkbox"/> 28e	<input type="checkbox"/> 28f	<input type="checkbox"/> 28g	<input type="checkbox"/> 28h	<input type="checkbox"/> 28i

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

PROGRESS FOR WASHINGTON

Full Name (Last, First, Middle Initial)

A. Meyers Research and Strategic Services

Date of Disbursement

06	26	2012
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Mailing Address 6225 Cardinal Brook Court

City	State	Zip Code
Springfield	VA	22152

Transaction ID : S821B.4108

 Purpose of Disbursement
 Polling

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

13890.00

 Office Sought: ☐ House
 ☐ Senate
 ☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

B.

Date of Disbursement

--	--	--

Mailing Address

City	State	Zip Code
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Purpose of Disbursement

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

 Office Sought: ☐ House
 ☐ Senate
 ☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

C.

Date of Disbursement

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Mailing Address

City	State	Zip Code
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Purpose of Disbursement

Amount of Each Disbursement this Period

Candidate Name

 Category/
 Type

 Office Sought: ☐ House
 ☐ Senate
 ☐ President

 Disbursement For:
☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

13890.00

TOTAL This Period (last page this line number only).....▶

13890.00

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SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

 PAGE 8 OF 8
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) PROGRESS FOR WASHINGTON		FEC IDENTIFICATION NUMBER <div style="border: 1px solid black; padding: 2px;">C C00523571</div>	
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on			
Full Name (Last, First, Middle Initial) of Payee Mundy Katowitz Media, Inc.		Date <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">08</div> <div style="border: 1px solid black; padding: 2px;">26</div> <div style="border: 1px solid black; padding: 2px;">2012</div> </div>	
Mailing Address 1322 G Street, SE		Amount <div style="border: 1px solid black; padding: 2px; text-align: right;">75544.20</div>	
City Washington State DC Zip Code 20003		Transaction ID: SE4110	
Purpose of Expenditure TV Advertising - Dissem 7/17/2012		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WA District: 01	
Name of Federal Candidate Supported or Opposed by Expenditure: SUZAN K DELBENE		Check One: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	
Calendar Year-To-Date Per Election for Office Sought <div style="border: 1px solid black; padding: 2px; text-align: right;">0.00</div>		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify)	
Full Name (Last, First, Middle Initial) of Payee		Date	
Mailing Address		Amount	
City State Zip Code		Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: District:	
Purpose of Expenditure		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Name of Federal Candidate Supported or Opposed by Expenditure:		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	

(a) SUBTOTAL of Itemized Independent Expenditures.....	75544.20
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	75544.20

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

JEREMY PEMBLE

Signature

(Electronically Filed)

Date

07

15

2012

13044330570

24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

(SCHEDULE E)

PAGE 1 OF 2
FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) PROGRESS FOR WASHINGTON		FEC IDENTIFICATION NUMBER C00523571	
Check If <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on			
Full Name (Last, First, Middle Initial) of Payee Gumbinner & Davies		Date MM / DD / YYYY 07 / 17 / 2012	
Mailing Address 2001 S Street, NW Suite 301		Amount 21326.38	
City Washington	State DC	Zip Code 20009	
Purpose of Expenditure Printing and Postage		Category/ Type	Transaction ID : SE4132
Name of Federal Candidate Supported or Opposed by Expenditure: LAURA RUDERMAN		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WA District: 01	
Calendar Year-To-Date Per Election for Office Sought 182186.10		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Full Name (Last, First, Middle Initial) of Payee Mundy Katowitz Media, Inc.		Date MM / DD / YYYY 06 / 26 / 2012	
Mailing Address 1322 G Street, SE		Amount 75544.20	
City Washington	State DC	Zip Code 20003	
Purpose of Expenditure TV Advertising - Dissem 7/17/2012		Category/ Type	Transaction ID : SE4133
Name of Federal Candidate Supported or Opposed by Expenditure: SUZAN K DELBENE		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WA District: 01	
Calendar Year-To-Date Per Election for Office Sought 75544.20		Check One: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	
Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify)			
(a) SUBTOTAL of Itemized Independent Expenditures.....		96872.58	
(b) SUBTOTAL of Unitemized Independent Expenditures.....			
(c) TOTAL Independent Expenditures.....			
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Signature JEREMY PEMBLE		Date MM / DD / YYYY 07 / 17 / 2012	
[Electronically Filed]			

13044330571

24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

(SCHEDULE E)

PAGE 2 OF 2
FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) PROGRESS FOR WASHINGTON		FEC IDENTIFICATION NUMBER C00523571	
Check if <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on _____			
Full Name (Last, First, Middle Initial) of Payee The Hamburger Company		Date MM / DD / YYYY 07 / 17 / 2012	
Mailing Address 5505 Connecticut Ave., NW #219		Amount 14420.00	
City Washington	State DC	Zip Code 22015	
Purpose of Expenditure Media Production		Category/Type _____	
Name of Federal Candidate Supported or Opposed by Expenditure: SUZAN K DELBENE		Office Sought: <input checked="" type="checkbox"/> House State: WA <input type="checkbox"/> Senate District: 01 <input type="checkbox"/> President	
Calendar Year-To-Date Per Election for Office Sought 196606.10		Check One: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	
Full Name (Last, First, Middle Initial) of Payee		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	
Mailing Address		Date MM / DD / YYYY _____	
City		Amount _____	
State		Office Sought: <input type="checkbox"/> House State: _____ <input type="checkbox"/> Senate District: _____ <input type="checkbox"/> President	
Zip Code		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose	
Purpose of Expenditure		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	
Category/Type _____		Name of Federal Candidate Supported or Opposed by Expenditure:	
Name of Federal Candidate Supported or Opposed by Expenditure:		Calendar Year-To-Date Per Election for Office Sought _____	
Calendar Year-To-Date Per Election for Office Sought		Date MM / DD / YYYY _____	
Amount _____		Office Sought: <input type="checkbox"/> House State: _____ <input type="checkbox"/> Senate District: _____ <input type="checkbox"/> President	
Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	
(a) SUBTOTAL of Itemized Independent Expenditures.....		14420.00	
(b) SUBTOTAL of Unitemized Independent Expenditures.....		_____	
(c) TOTAL Independent Expenditures.....		111292.58	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Signature JEREMY PEMBLE		Date 07 / 17 / 2012	

[Electronically Filed]

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24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

(SCHEDULE E)

PAGE 1 OF 1
FOR SE OF FORM 2448

NAME OF COMMITTEE (In Full) PROGRESS FOR WASHINGTON		FEC IDENTIFICATION NUMBER C00523571							
Check if <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on _____									
Full Name (Last, First, Middle Initial) of Payee Gumbiner & Davies		Date MM / DD / YYYY 07 / 10 / 2012							
Mailing Address 2001 S Street, NW Suite 301		Amount 21328.38							
City Washington	State DC	Zip Code 20009							
Purpose of Expenditure Printing and Postage		Category/Type _____							
Name of Federal Candidate Supported or Opposed by Expenditure: SUZAN K DELBENE		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WA District: 01							
Calendar Year-To-Date Per Election for Office Sought 63985.14		Check One: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose							
Full Name (Last, First, Middle Initial) of Payee		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify) _____							
Mailing Address		Date MM / DD / YYYY _____							
City		Amount _____							
State		Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____							
Zip Code		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose							
Purpose of Expenditure		Category/Type _____							
Name of Federal Candidate Supported or Opposed by Expenditure:		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____							
Calendar Year-To-Date Per Election for Office Sought		_____							
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">(a) SUBTOTAL of Itemized Independent Expenditures.....</td> <td style="width: 40%; text-align: right;">21328.38</td> </tr> <tr> <td>(b) SUBTOTAL of Unitemized Independent Expenditures.....</td> <td style="text-align: right;">_____</td> </tr> <tr> <td>(c) TOTAL Independent Expenditures.....</td> <td style="text-align: right;">21328.38</td> </tr> </table>				(a) SUBTOTAL of Itemized Independent Expenditures.....	21328.38	(b) SUBTOTAL of Unitemized Independent Expenditures.....	_____	(c) TOTAL Independent Expenditures.....	21328.38
(a) SUBTOTAL of Itemized Independent Expenditures.....	21328.38								
(b) SUBTOTAL of Unitemized Independent Expenditures.....	_____								
(c) TOTAL Independent Expenditures.....	21328.38								
<p>Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.</p> <p style="text-align: center;">JEREMY PEMBLE [Electronically Filed] Date 07 / 10 / 2012</p> <p>Signature _____</p>									

13044330573

24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

(SCHEDULE E)

PAGE 1 OF 1
FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) PROGRESS FOR WASHINGTON		FEC IDENTIFICATION NUMBER C00523571	
Check if <input checked="" type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on _____			
Full Name (Last, First, Middle Initial) of Payee Gumbinner & Davies		Date MM / DD / YYYY 07 / 13 / 2012	
Mailing Address 2001 S Street, NW Suite 301		Amount 21328.38	
City Washington		State DC	
Zip Code 20009		Transaction ID: SE4125	
Purpose of Expenditure Printing and Postage		Category/Type 	
Name of Federal Candidate Supported or Opposed by Expenditure: SUZAN K DELBENE		Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: WA District: 01	
Check One: <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify) _____	
Calendar Year-To-Date Per Election for Office Sought 85313.52			
Full Name (Last, First, Middle Initial) of Payee		Date	
Mailing Address		MM / DD / YYYY	
City		Amount	
State		MM / DD / YYYY	
Zip Code		Amount	
Purpose of Expenditure		Category/Type	
Name of Federal Candidate Supported or Opposed by Expenditure:		Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____	
Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General 2012 <input type="checkbox"/> Other (specify) _____	
Calendar Year-To-Date Per Election for Office Sought			
(a) SUBTOTAL of Itemized Independent Expenditures.....		21328.38	
(b) SUBTOTAL of Unitemized Independent Expenditures.....			
(c) TOTAL Independent Expenditures.....		21328.38	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Signature JEREMY PEMBLE		Date MM / DD / YYYY 07 / 15 / 2012	
[Electronically Filed]			

13044330374

24/48 HOUR NOTICE OF INDEPENDENT EXPENDITURES

(SCHEDULE E)

PAGE 1 OF 1
FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full)
PROGRESS FOR WASHINGTON

FEC IDENTIFICATION NUMBER ▼

C C00523571

Check if ☒ 24-hour report ☐ 48-hour report ☒ New report ☐ Amends report filed on

Full Name (Last, First, Middle Initial) of Payee
Gumbinner & Davies

Date

07 / 19 / 2012

Mailing Address 2001 S Street, NW
Suite 301

Amount

21328.38

City State Zip Code
Washington DC 20009

Transaction ID: SE4140

Purpose of Expenditure
Printing and Postage

Category/
Type

Office Sought: ☒ House ☐ Senate ☐ President
State: WA District: 01

Name of Federal Candidate Supported or Opposed by Expenditure:
SUZAN K DELBENE

Check One: ☐ Support ☒ Oppose

Calendar Year-To-Date Per Election
for Office Sought 142390.28

Disbursement For: ☒ Primary ☐ General
2012 ☐ Other (specify)

Full Name (Last, First, Middle Initial) of Payee

Date

07 / 19 / 2012

Mailing Address

Amount

City State Zip Code

Purpose of Expenditure

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
State: District:

Name of Federal Candidate Supported or Opposed by Expenditure:

Check One: ☐ Support ☐ Oppose

Calendar Year-To-Date Per Election
for Office Sought

Disbursement For: ☐ Primary ☐ General
☐ Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....

21328.38

(b) SUBTOTAL of Unitemized Independent Expenditures.....

(c) TOTAL Independent Expenditures.....

21328.38

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

JEREMY PEMBLE

[Electronically Filed]

Date

07 / 19 / 2012

Signature

13044330575